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August 26, 1996

Ms. Laurie Mann
U. S. EPA, Region X
Mail Code OW-130
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Mann:

RE: NPDES Permit No. AKG285010, Spark Platform, Cook Inlet, Alaska

This letter serves to document our conversation concerning the discharge of deck drainage from the above referenced facility. Notification was previously sent to EPA that as of January 1992 operations at this facility would be temporarily suspended. Therefore, notice was also given that Discharge Monitoring Reports (DMRs) would not be submitted until such time that operation and discharges occurred. Marathon did submit a notice of intent for the Spark Platform to be covered under the upcoming permit renewal.

Work is under way to commence natural gas production from this former oil producing facility. Installation of gas production facilities is expected to be completed by October 15, 1996. To facilitate construction activities, deck drainage from the top deck of the facility will be collected and discharged. Deck drainage from the top deck of the facility is rainfall and snowmelt which collects on roofs and is not in contact with oil and grease. As I understand, the following permit interpretations were agreed to in our August 22, 1996 conversation:

- 1) Only deck drainage that may be contaminated with oil and grease is required to be processed through an oil-water separator.
- 2) Only deck drainage which is passed through an oil-water separator is required to be observed for a visual (or static) sheen.
- 3) Deck drainage not contaminated by oil and grease has no requirements under the permit except for volume reporting, therefore no DMR reports are necessary if this is the only active requirement for the facility.

File No. 490.57

Please contact me at (907) 564-6372 if there has been any misunderstanding in interpretation of the existing permit.

We do not perceive an immediate need for discharges other than deck drainage. The small amount of produced water projected to be generated will be disposed of in a permitted injection well. This facility will be unmanned once production begins.

Comments have been provided to EPA on the proposed permit which requested special monitoring considerations for unmanned facilities. Our unmanned facility can comply with the above listed interpretations, and an extension of these ideas are desired for the upcoming permit renewal. Jim Scialabba can be contacted at (419) 421-3458 if you need any information in conjunction with the permit renewal.

Sincerely,



Stephanie Olson
Environmental Engineer

SSO:kgh

cc: M. J. Allen
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Jim Scialabba - MOC Findlay
Chae Park, EPA
Mark Ryan, EPA
File 60.9.2